

ORIGINAL



0000061701

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

30ET

**COMMISSIONERS**

2006 SEP 27 P 4:30

JEFF HATCH-MILLER, Chairman  
WILLIAM A. MUNDELL  
MIKE GLEASON  
KRISTIN K. MAYES  
BARRY WONG

AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF  
ARIZONA PUBLIC SERVICE COMPANY FOR A  
HEARING TO DETERMINE THE FAIR VALUE  
OF THE UTILITY PROPERTY OF THE  
COMPANY FOR RATEMAKING PURPOSES, TO  
FIX A JUST AND REASONABLE RATE OF  
RETURN THEREON, TO APPROVE RATE  
SCHEDULES DESIGNED TO DEVELOP SUCH  
RETURN, AND TO AMEND DECISION NO.  
67744.

DOCKET NO. E-01345A-05-0816

Arizona Corporation Commission

**DOCKETED**

SEP 27 2006

DOCKETED BY

nr

IN THE MATTER OF THE INQUIRY INTO THE  
FREQUENCY OF UNPLANNED OUTAGES  
DURING 2005 AT PALO VERDE NUCLEAR  
GENERATING STATION, THE CAUSES OF THE  
OUTAGES, THE PROCUREMENT OF  
REPLACEMENT POWER AND THE IMPACT OF  
THE OUTAGES ON ARIZONA PUBLIC  
SERVICE COMPANY'S CUSTOMERS.

DOCKET NO. E-01345A-05-0826

IN THE MATTER OF THE AUDIT OF THE FUEL  
AND PURCHASED POWER PRACTICES AND  
COSTS OF THE ARIZONA PUBLIC SERVICE  
COMPANY.

DOCKET NO. E-01345A-05-0827

**MOTION TO EXTEND**

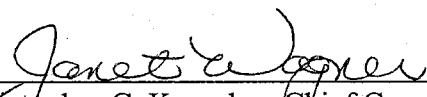
Arizona Corporation Commission Staff ("Staff") hereby requests an extension of time in which to file the surrebuttal testimony of two Staff witnesses, William Jacobs and James Daniel. Both of these witnesses will address issues related to the Palo Verde Nuclear Generating Station ("Palo Verde").

Staff proposes to file the surrebuttal testimony of these two witnesses on October 13, 2006. For purposes of scheduling witnesses for the hearing, Staff suggests segregating the Palo Verde issues and addressing those issues at the end of the hearing. This placement should eliminate any inconvenience that may be caused by an extension of the surrebuttal filing deadline for these two

1 witnesses. Staff would also support allowing APS a commensurate extension of time in which to file  
2 its rejoinder testimony for these issues. Finally, Staff wishes to clarify that it is not requesting any  
3 delay to the commencement of the hearing, which is currently scheduled to begin on October 10,  
4 2006.

5 Counsel for Staff has communicated the contents of this motion to counsel for APS. It is  
6 Staff's understanding that APS does not oppose this motion.

7 RESPECTFULLY SUBMITTED this 27<sup>th</sup> day of September, 2006.  
8

9  
10   
11 Christopher C. Kempley, Chief Counsel  
12 Janet Wagner, Senior Staff Counsel  
13 Arizona Corporation Commission  
14 1200 West Washington Street  
15 Phoenix, Arizona 85007  
16 (602) 542-3402

17 Original and 17 copies of the foregoing filed  
18 this 27<sup>th</sup> day of September, 2006 with:

19 Docket Control  
20 Arizona Corporation Commission  
21 1200 West Washington Street  
22 Phoenix, Arizona 85007  
23

24 Copy of the foregoing mailed this  
25 27<sup>th</sup> day of September, 2006 to:

26 Deborah R. Scott  
27 Kimberly A. Grouse  
28 Snell & Wilmer  
One Arizona Center  
400 East Van Buren  
Phoenix, AZ 85004-2202

C. Webb Crockett  
Patrick J. Black  
Fennemore Craig, P.C.  
3003 North Central Avenue, Suite 2600  
Phoenix, AZ 85012-2913

Thomas L. Mumaw  
Karilee S. Ramaley  
Pinnacle West Capital Corporation  
P. O. Box 53999, MS 8695  
Phoenix, AZ 85072-3999

Michelle Livengood  
UniSource Energy Services  
One South Church Street, Suite 200  
Tucson, AZ 85702

1 Donna M. Bronski  
2 Deputy City Attorney  
3 City Attorney's Office  
4 3939 North Drinkwater Blvd.  
5 Scottsdale, AZ 85251

6 Walter W. Meek, President  
7 Arizona Utility Investors Association  
8 2100 North Central Avenue, Suite 210  
9 Phoenix, AZ 85004

10 Dan Austin  
11 Comverge, Inc.  
12 6509 West Frye Road, Suite 4  
13 Chandler, AZ 85226

14 Jay I. Moyes  
15 Moyes Storey Ltd.  
16 1850 North Central Avenue, Suite 1100  
17 Phoenix, AZ 85004

18 Robert W. Geake  
19 Vice President and General Counsel  
20 Arizona Water Company  
21 P. O. Box 29006  
22 Phoenix, AZ 85038-9006

23 Greg Patterson  
24 Arizona Competitive Power Alliance  
25 916 West Adams, Suite 3  
26 Phoenix, AZ 85007

27 George Bien-Willner  
28 3641 North 39<sup>th</sup> Avenue  
Phoenix, AZ 85014

Lawrence V. Robertson, Jr.  
P. O. Box 1448  
Tubac, AZ 85646

Andrew W. Bettwy  
Karen S. Haller  
Assistants General Counsel  
Legal Affairs Department  
Southwest Gas Corporation  
5241 Spring Mountain Road  
Las Vegas, NV 89150

Michael W. Patten  
J. Matthew Derstine  
Laura E. Sixkiller  
Roshka DeWulf & Patten, PLC  
One Arizona Center  
400 East Van Buren, Suite 800  
Phoenix, AZ 85004

Sein Seitz  
President  
Arizona Solar Energy Industries Association  
3008 North Civic Center Plaza  
Scottsdale, AZ 85251

Timothy M. Hogan  
Arizona Center for Law in the Public Interest  
202 East McDowell Road, Suite 153  
Phoenix, AZ 85004

Kenneth R. Saline, P.E.  
K.R. Saline & Assoc., PLC  
160 North Pasadena, Suite 101  
Mesa, AZ 85201

Lieutenant Colonel Karen S. White  
Chief, Air Force Utility Litigation Team  
AFLSA/JACL-ULT  
139 Barnes Drive  
Tyndall AFB, FL 32403

Jim Nelson  
12621 North 17<sup>th</sup> Place  
Phoenix, AZ 85022

Scott S. Wakefield  
RUCO  
1110 West Washington, Suite 220  
Phoenix, AZ 85007

Bill Murphy  
Murphy Consulting  
5401 North 25<sup>th</sup> Street  
Phoenix, AZ 85016

1 Douglas V. Fant  
2 Law Offices of Douglas V. Fant  
3 3655 West Anthem Drive  
4 Suite A-109, PMB 411  
5 Anthem, AZ 85086

Tracy Spoon  
Sun City Taxpayers Association  
12630 North 103<sup>rd</sup> Avenue, Suite 144  
Sun City, AZ 85351

6 Michael L. Kurtz  
7 Kurt J. Boehm  
8 BOEHM, KURTZ & LOWRY  
9 36 East Seventh St., Suite 1510  
10 Cincinnati, OH 45202

Amanda Ormond  
The Ormond Group LLC  
Southwest Representative  
Interwest Energy Alliance  
7650 South McClintock, Suite 103-282  
Tempe, AZ 85284

11 David C. Kennedy, Esq.  
12 818 East Osborn Road, Suite 103  
13 Phoenix, AZ 85014

Tammie Woody  
10825 West Laurie Lane  
Peoria, AZ 85345

14 Michael M. Grant  
15 Gallagher & Kennedy, P.A.  
16 2575 East Camelback Road  
17 Phoenix, AZ 85016-9225

Joseph Knauer, President  
Jewish Community of Sedona  
and the Verde Valley  
100 Meadowlark Drive  
Post Office Box 10242  
Sedona, AZ 86339-8242

18 S. David Childers, Esq.  
19 Low & Childers  
20 2999 North 44<sup>th</sup> Street, Suite 250  
21 Phoenix, AZ 85018

22 Roseann Osorio  
23  
24  
25  
26  
27  
28